# UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Case No. 17-cr-00686 (LAK)

V.

ECF Case

JAMES GATTO,

a/k/a "Jim,"

MERL CODE, and

CHRISTIAN DAWKINS,

Defendants.

Defendants.

Defendants.

X

Case No. 17-cr-00686 (LAK)

ECF Case

NOTICE OF DEFENDANTS'

MOTION TO COMPEL THE

GOVERNMENT TO REVIEW

EVIDENCE IN ITS

POSSESSION FOR BRADY

MATERIAL

MATERIAL

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, and the exhibits thereto, Defendants James Gatto, Merl Code, and Christian Dawkins, by their attorneys, shall move before the Honorable Lewis A. Kaplan of the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, for an Order granting Defendants' Motion to Compel the Government to Review Evidence in its Possession for *Brady* Material, as per the following schedule set by the Court:

- All motions by Defendants other than motions addressed to the indictment shall be filed on or before February 9, 2018;
- Answering papers by the Government, if any, shall be filed on or before March 9, 2018;
- Reply papers by Defendants, if any, shall be filed on or before March 19, 2018;
- The Court will hear argument on March 22, 2018 at 4:00 pm.

Dated: New York, New York February 9, 2018

NEXSEN PRIVET LLC

William W. Wilkins

By:

Mark C. Moore Andrew A. Mathias

55 E. Camperdown Way, Suite 400 Greenville, South Carolina 29601 (864) 370-2211

Attorneys for Defendant Merl Code

## HANEY LAW GROUP PLLC

By: \_\_\_\_\_\_ Steven A. Haney 3000 Town Center Drive, Suite 2570 Southfield, Michigan 48075 (248) 414-1470 Attorneys for Defendant Christian Dawkins

## WILLKIE FARR & GALLAGHER LLP

By: \_\_\_\_\_\_ Michael S. Schachter Casey E. Donnelly 787 Seventh Avenue New York, New York 10019 (212) 728-8000

## ANGELI LAW GROUP LLC

David Angeli 121 SW Morrison Street, Suite 400 Portland, Oregon 97204 (503) 222-1552

Attorneys for Defendant James Gatto

Dated: New York, New York

February 9, 2018

#### **NEXSEN PRUET LLC**

HANEY/LAW GROUP PLLC

By: Steven A. Haney

3000 Town Center Drive, Suite 2\$70

Southfield, Michigan 48075

(248) 414-1470

Attorneys for Defendant Christian Dawkins

## WILLKIE FARR & GALLAGHER LLP

By: \_\_\_\_\_\_ Michael S. Schachter Casey E. Donnelly 787 Seventh Avenue New York, New York 10019 (212) 728-8000

## ANGELI LAW GROUP LLC

David Angeli 121 SW Morrison Street, Suite 400 Portland, Oregon 97204 (503) 222-1552

Attorneys for Defendant James Gatto

Dated:

New York, New York

February 9, 2018

#### **NEXSEN PRUET LLC**

## HANEY LAW GROUP PLLC

By: \_\_\_\_\_\_ Steven A. Haney 3000 Town Center Drive, Suite 2570 Southfield, Michigan 48075 (248) 414-1470 Attorneys for Defendant Christian Dawkins

# WILLKIE FARR & GALLAGHER LLP

Michael S. Schachter
Casey E. Donnelly
787 Seventh Avenue
New York, New York 10019
(212) 728-8000

ANGELI LAW GROUP LLC

David Angeli 121 SW Morrison Street, Suite 400 Portland, Oregon 97204 (503) 222-1552

Attorneys for Defendant James Gatto